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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	S E A L E D
	:	
Plaintiff,	:	I N D I C T M E N T
	:	
vs.	:	VIO. 16 U.S.C. § 470ee, 18 U.S.C. §§
	:	641, 1361, 2
CARL LAVERN CRITES, RICHARD	:	TRAFFICKING IN STOLEN
RAYMOND BOURRET, MARIE VIRGINIA	:	ARTIFACTS, THEFT OF
CRITES and STEVEN L. SHRADER,	:	GOVERNMENT PROPERTY,
	:	DEPREDATION OF GOVERNMENT
Defendants.	:	PROPERTY, FORFEITURE

The Grand Jury charges:

COUNT 1

Case: 2:09-cr-00303
Assigned To : Benson, Dee
Assign. Date : 5/27/2009
Description: USA v.

On or about August 27, 2008, in the Central Division of the District of Utah and
elsewhere,

CARL LAVERN CRITES, MARIE VIRGINIA CRITES and

STEVEN L. SHRADER

defendants herein, did embezzle, steal, purloin, or knowingly convert to their own use or the use
of another, or without authority, sell, convey, or dispose of property of the United States to wit:

one pair of basket-maker sandals the value of which exceeds the sum of \$1000.00, and did aid and abet therein, all in violation of 18 U.S.C. §§ 641 and 2.

COUNT 2

On or about August 27, 2008, in the Central Division of the District of Utah and elsewhere,

CARL LAVERN CRITES, MARIE VIRGINIA CRITES, and

STEVEN L. SHRADER

defendants herein, did embezzle, steal, purloin, or knowingly convert to their own use or the use of another, or without authority, sell, convey, or dispose of property of the United States to wit: one basket-maker basket the value of which exceeds the sum of \$1000.00, and did aid and abet therein, all in violation of 18 U.S.C. §§ 641 and 2.

COUNT 3

On or about September 14, 2008, in the Central Division of the District of Utah,

CARL LAVERN CRITES and RICHARD RAYMOND BOURRET,

defendants herein, did knowingly excavate, remove, damage, or otherwise alter or deface, or attempt to excavate, remove, damage, or otherwise alter or deface an archaeological resource located on public lands, which activity was not conducted pursuant to a permit issued pursuant to 16 U.S.C. § 470cc, and the archaeological value of said resource and the cost of its restoration and repair exceeds the sum of \$500, and did aid and abet therein, all in violation of 16 U.S.C. § 470cc(a) and 18 U.S.C. § 2.

COUNT 4

On or about September 14, 2008, in the Central Division of the District of Utah,

CARL LAVERN CRITES,

defendant herein, did knowingly transport an archaeological resource, to wit: a San Jose knife, which resource had been excavated or removed from public lands in violation of Federal law, which resource was valued in excess of \$500, all in violation of 16 U.S.C. § 470ee(b).

COUNT 5

On or about September 14, 2008, in the Central Division of the District of Utah, on public lands of the United States administered by the U. S. Bureau of Land Management,

CARL LAVERN CRITES and RICHARD RAYMOND BOURRET

defendants herein, did willfully injure and commit depredation against property of the United States, by excavating, damaging, and otherwise altering archaeological resources; the damage to such property exceeds \$1,000.00, all in violation of 18 U.S.C. § 1361.

NOTICE OF INTENTION TO SEEK FORFEITURE

As a result of committing the offenses alleged in Counts 1 through 5 of this Indictment, the defendants shall forfeit to the United States pursuant to 16 U.S.C. §470gg(b) all archaeological resources with respect to which a violation of 16 U.S.C. § 470ee occurred and all vehicles and equipment of any person which were used in any manner or part to commit and facilitate the commission of such offense.

The defendants shall also forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 1956(c)(7)(D) and 28 U.S.C. § 2461 any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 641 and 1361.

If any of the property described above, as a result of any act or omission of the

Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without


difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney



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